UNIVERSE, THE CMI GLOBAL NETWORK FUND ("THE FUND")

Société d'Investissement à Capital Variable

Registered office: 106 route d'Arlon, L- 8210 Mamer

R.C.S. Luxembourg B 33463

Voting Rights Policy (the "Policy")

1. Introduction

The objective is to describe the Policy of Universe, The CMI Global Network Fund (the "fund") relating to the exercise of voting rights to the instruments held in the fund.

2. Legal Framework

The rules for the exercise of voting rights in Luxembourg is mainly based on the following European regulations, Luxembourg laws, regulations and circulars:

- Article 37 of Commission Delegated Regulation 231/2013 ("AIFM-CDR") the European Commission Delegated Regulation (EU) Nr 231/2013 of December 19th, 2012, supplementing Directive 2011/61/EU of the European Parliament and of the Council with regard to exemptions, general operating conditions, depositaries, leverage, transparency and supervision (the "European Commission Delegated Regulation");

- Law of 17 December 2010 (the "UCITS Law");

- Law of 12 July 2013 on Alternative Investment fund Managers (the "AIFM Law");

- Article 23 of CSSF Regulation 10-4 transposing commission directive 2010/43/EU of 1 July 2010 implementing directive 2009/65/EC (the "CSSF Regulation 10-4");

- CSSF circular 18/698 on authorisation and organisation of Luxembourg management companies (the "CSSF circular 18/698").

Proxy voting is subject to strict regulation as described in Article 23 of the Regulation 10-4 and Article 37 of AIFM-CDR, and provides for the establishment of:

- Appropriate and effective strategies for the exercise of voting rights;

- Measures and procedures to monitor corporate events;

- Ensure that voting rights are properly exercised;

- Prevent or manage conflicts of interest resulting from the exercise of voting rights.

3. Guiding principles

The fund delegate's investment management activity, including voting activity to the investment manager.

- The main investment manager is Schroder Investment Management Limited.
- The fund also delegates investment management activity to Insight Investment Management (Global) Limited and BlackRock Investment Management (UK) Limited.

The delegation of the exercise of voting rights to a third party investment manager is formalised in the relevant investment management agreement concluded between the fund and the relevant third party investment manager.

The third party investment manager is responsible for:

- Ensuring that the exercise of voting rights is in accordance with the investment objectives and policy of the fund.
- Preventing and managing any conflicts of interest arising in the exercise of voting rights.

The methodology of the voting policy of the delegated third party investment managers can be found on the following links:

Schroder Investment Management Limited
https://mybrand.schroders.com/m/22ba7315c2a0cb4f/original/615750_SC_IDD_Global-Voting-Guidelines-JUL25.pdf

BlackRock Investment Management (UK) Limited
BlackRock Investment Stewardship - Global Principles

Insight Investment Management (Global) Limited
Investing Responsibly | Insight Investment